REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: August 8, 2000

ANALYST: Kenneth Davis

I. **COMMITTEE:** Citizens for the Republic (C00075390)

Carolyn Robertson, Treasurer

11321 Hunt Farm Lane Oakton, VA 22124

II.

RELEVANT STATUTE: 2 U.S.C. §434(a)(4)(A)(i)

11 CFR §104.5(c)(1)(i)(A)

III. **BACKGROUND:**

Failure to Timely File the 2000 April Quarterly Report

The Citizens for the Republic ("the Committee") failed to timely file the 2000 April Quarterly Report of Receipts and Disbursements covering the period from January 1, 2000 to March 31, 2000. On December 29, 1999 and March 22, 2000, Prior Notices were sent to the Committee informing it that the 2000 April Quarterly Report was due on April 15, 2000 (Attachments 2 and 3). A Non-Filer Notice was sent to the Committee via mailgram on May 10, 2000 (Attachment 4).

On June 8, 2000, the Reports Analysis Division ("RAD") analyst attempted to call Ms. Carolyn Robertson, Treasurer. Only one phone number was obtained by the analyst, but Ms. Roberston was not at the number. The analyst asked to speak to Ms. Angela Buchanan, assistant treasurer, as she was the person referenced in the same document as the phone number. Ms. Buchanan was not available, so the analyst was transferred to her assistant. The analyst left a message with Ms. Buchanan's assistant stating that it appeared the Committee had not filed the 2000 April Quarterly Report. The assistant said that Ms. Buchanan would call back (Attachment 5).

CITIZENS FOR THE REPUBLIC REPORTS ANALYSIS OGC REFERRAL PAGE 2

On June 15, 2000, the RAD analyst received a phone call from Sherry (last name unknown), who was calling for the treasurer of the Committee. Sherry referenced the analyst's call to Ms. Buchanan, and said that Ms. Robertson was out of town and would return on the following Monday (June 19, 2000) to work on the 2000 April Quarterly Report. The analyst informed Sherry that if the report was not received soon, the Committee would be referred for legal action (Attachment 6).

After not hearing from the Committee, the RAD analyst attempted to call Ms. Buchanan on June 28, 2000. Ms. Buchanan was not available, so the analyst left a message explaining that the 2000 April Quarterly Report still had not been received and reminded the Committee that they would be referred for legal action if the report was not filed. The analyst asked for Ms. Buchanan to call back (Attachment 7).

The Committee filed the report on July 5, 2000 (Attachment 8).

| OMMITTEE | DOCUMENT | RECEIPTS | DISBURSEMENTS | # OF IMAGE COVERAGE DATES PAGES LOCATION TYPE OF FILER |
|-------------|---|-----------|---------------|--|
| | ENS FOR THE REPUBLIC ORGANIZATION: NONE | | | ID #C00075390 NON-PARTY QUALIFIED |
| | 99 APRIL QUARTERLY | 12,708 | 1,495 | 1JAN99 -31MAR99 8 99FEC/443/3169 |
| 193 | APRIL QUARTERLY - AMENDMENT | 12,708 | 1,495 | 1JAN99 - 31MAR99 8 99FEC/462/4857 |
| | 1'ST LETTER INFORMATIONAL NOTICE | 12,700 | 1,400 | 1JAN99 -31MAR99 3 99FEC/494/4743 |
| | JULY QUARTERLY | 75,797 | 16,398 | 1APR99 -30JUN99 13 99FEC/462/2280 |
| | OCTOBER QUARTERLY | 35,865 | 48,403 | 1JUL99 -30SEP99 9 99FEC/490/2123 |
| | YEAR-END | 109,071 | 49,606 | 10CT99 -31DEC99 12 20FEC/524/3645 |
| | YEAR-END - AMENDMENT | - | | 10CT99 -31DEC99 6 20FEC/557/3730 |
| | REQUEST FOR ADDITIONAL INFORMATION | | | 10CT99 -31DEC99 3 20FEC/539/3032 |
| _ | REQUEST FOR ADDITIONAL INFORMATION 2ND | | | 10CT99 -31DEC99 4 20FEC/555/4295 |
| 200 | O APRIL QUARTERLY | 2,477 | 62,416 | 1JAN00 -31MAR00 8 20FEC/570/2334 |
| ħ, | NOTICE OF FAILURE TO FILE | -, | 02,7.0 | 1JAN00 -31MAR00 2 20FEC/558/0565 |
| p s Rust | REQUEST FOR ADDITIONAL INFORMATION | | | 1JAN00 -31MAR00 3 20FEC/587/4970 |
| | JULY QUARTERLY | 6,332 | 144 | 1APR00 -30JUN00 5 20FEC/573/3523 |
| ļ# | TOTAL | 242,250 | 0 178,462 . | 0 84 TOTAL PAGES |
| Y | | | • | |

All reports have been reviewed.

Cash on hand as of 6/30/2000: \$127,015.02

Debts owed to the committee: 0.00

Debts owed by the committee: 0.00

REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

December 29, 1999

WHO MUST FILE

Party committees and PACs (Nonconnected Committees and Separate Segregated Funds) must file a Year-End Report on January 31, 2000.

I. Semi-annual Filers

| REPORT | REPORTING PERIOD ¹ | REG./CERT. MAILING DATE ² | FILING DATE |
|----------|-------------------------------|--|----------------|
| Year-End | 07/01/99 - 12/31/99 | 01/31/00 | 01/31/00 |

II. Monthly Filers

| REPORT | REPORTING PERIOD ¹ | REG./CERT. MAILING DATE ² | FILING DATE |
|----------|-------------------------------|--|----------------|
| Year-End | 12/01/99 - 12/31/99 | 01/31/00 | 01/31/00 |

LABEL

Committees should affix the peel-off label from the envelope to line 1 of the report. Corrections should be made on the label.

COMPLIANCE

Treasurers of political committees are responsible for the accuracy of all reports and for filing all reports on time. Treasurers may be subject to enforcement action if reports are not filed timely or reports are inaccurate. Committees filing illegible reports or using non-FEC forms (except for FEC approved computer generated forms) will be required to refile.

ELECTRONIC FILING

Political committees have the option of filing electronically. If you are interested in this option, review the enclosed handout entitled "Electronic Filing of Disclosure Reports," and call the Data Division at (800) 424-9530 or (202) 694-1306.

These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

²Reports sent by registered or certified mail must be postmarked by the mailing date; otherwise, they must be received by the filing date.



2000 FILING SCHEDULE

I. QUARTERLY FILERS

PARTIES AND PACS

| | | REG./CERT. | |
|-------------------|-------------------------------|-------------------|---------------|
| • | · | MAILING | FILING |
| REPORT | REPORTING PERIOD ¹ | DATE ² | DATE |
| April Quarterly . | 01/01/00 - 03/31/00 | 04/15/00 | 04/15/003 |
| July Quarterly | 04/01/00 - 06/30/00 | 07/15/00 | $07/15/00^3$ |
| October Quarterly | 07/01/00 - 09/30/00 | 10/15/00 | $10/15/00^3$ |
| Pre-General | 10/01/00 - 10/18/00 | 10/23/00 | 10/26/00 |
| Post-General | 10/19/00 - 11/27/00 | 12/07/00 | 12/07/00 |
| Year-End | 11/28/00 - 12/31/00 | 01/31/01 | 01/31/01 |

II. MONTHLY FILERS

| | · · · · · · · · · · · · · · · · · · · | REG./CERT. | |
|--------------|---------------------------------------|-------------------|--------------|
| | • | MAILING | FILING |
| REPORT | REPORTING PERIOD ¹ | DATE ² | DATE |
| February | 01/01/00 - 01/31/00 | 02/20/00 | $02/20/00^3$ |
| March | 02/01/00 - 92/29/00 | 03/20/00 | 03/20/00 |
| April | 03/01/00 - 03/31/00 | 04/20/00 | 04/20/00 |
| May | 04/01/00 - 04/30/00 | 05/20/00 | $05/20/00^3$ |
| June | 05/01/00 - 05/31/00 | 06/20/00 | 06/20/00 |
| July | 06/01/00 - 06/30/00 | 07/20/00 | 07/20/00 |
| August | 07/01/00 - 07/31/00 | 08/20/00 | $08/20/00^3$ |
| September | 08/01/00 - 08/31/00 | 09/20/00 | 09/20/00 |
| October | 09/01/00 - 09/30/00 | 10/20/00 | 10/20/00 |
| Pre-General | 10/01/00 - 10/18/00 | 10/23/00 | 10/26/00 |
| Post-General | 10/19/00 - 11/27/00 | 12/07/00 | 12/07/00 |
| Year-End | 11/28/00 - 12/31/00 | 01/31/01 | 01/31/01 |

PRE-ELECTION REPORTING

Committees which make contributions or expenditures (including independent expenditures) in connection with an election must also file a Pre-Election Report, if the activity was not previously reported. See the January 2000 Record.

24 HOUR REPORT ON INDEPENDENT EXPENDITURES

Any Party Committee or PAC that makes independent expenditures in connection with an election may have to file a 24 hour report. This reporting requirement is triggered if the committee makes independent expenditures aggregating \$1,000 or more after the 20th day, but more than 24 hours, before the day of the election. This report is not required when a Party Committee or PAC makes a contribution directly to a candidate.

These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee

²Reports sent by registered or certified mail must be postmarked by the mailing date; otherwise, they must be received by the filing date.

³Note that filing dates are not extended when they fall on nonworking days. The FEC and Secretary of the Senate, however, will be open to receive reports on April 15, July 15 and October 15.

FOR INFORMATION, CALL: (800) 424-9530 or (202) 694-1100

QUARTERLY , REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

March 22, 2000

WHO MUST FILE

All Party Committees and PACs (Nonconnected Committees and Separate Segregated Funds) filing on a quarterly basis must file a Quarterly Report in April.

REPORTING DATES

| | | REG./CERT. | |
|-----------------|-------------------------------|------------------------------|-----------------------|
| REPORT | REPORTING PERIOD ¹ | MAILING DATE ² | FILING DATE |
| April Quarterly | 01/01/00 - 03/31/00 | 04/15/00 | 04/15/00 ³ |

24 HOUR REPORT ON INDEPENDENT EXPENDITURES

Any PAC or Party Committee that makes independent expenditures in connection with an election may have to file a 24 hour report. This reporting requirement is triggered if the committee makes independent expenditures aggregating \$1,000 or more after the 20th day, but more than 24 nours, before the day of the election. This report is *not* required when a Party Committee or PAC makes a contribution directly to a candidate.

PRE-ELECTION REPORTING

Committees which make contributions or expenditures (including independent expenditures) in connection with an election must also file a Pre-Election Report, if the activity was not previously reported. See the January 2000 <u>Record</u>.

LABEL

Committees should affix the peel-off label from the envelope to line 1 of the report. Corrections should be made on the label.

These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

²Reports sent by registered or certified mail must be postmarked by the mailing date; otherwise, they must be received by the filing date.

³Note that the filing date is a Saturday. Filing dates are not extended when they fall on nonworking days; however, the FEC and Secretary of the Senate will be open to receive reports on April 15.

CHANGE IN FILING FREQUENCY

Committees wishing to change their reporting schedule (for example, from quarterly to monthly) must notify the Commission in writing when they file their next report due under their current reporting schedule. Committees may change their filing frequencies no more than once per calendar year.

ELECTRONIC FILING

Political committees have the option of filing their reports electronically. If you are interested in this option, review the enclosed handout entitled "Electronic Filing," and call the Data Division at (800) 424-9530 or (202) 694-1306.

COMPLIANCE

Treasurers of political committees are responsible for the accuracy of all reports and for filing all reports on time. Treasurers may be subject to enforcement action if reports are not filed timely or reports are inaccurate. Committees filing illegible reports or using non-FEC forms (except for FEC approved computer generated forms) will be required to refile.

Attachment # 4
Page 1 of 1

WESTERN UNION COMMERCIAL SERVICES

CONFIRMATION OF MAILGRAM

TO:CAROLYN ROBERTSON
CITIZENS FOR THE REPUBLIC
11321 HUNT FARM LN
OAKTON VA 22124-1202

FEDERAL ELECTION COMMISSION SHAWN WERTH 999 E ST. NW. WASHINGTON DC 204630001

MAY 10, 2000

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C

C.

IDENTIFICATION NUMBER: C00075390

REFERENCE: APRIL QUARTERLY REPORT (01/01/2000 - 03/31/2000)

DEAR TREASURER:

IT HAS COME TO THE ATTENTION OF THE FEDERAL ELECTION COMMISSION THAT YOU MAY HAVE FAILED TO FILE THE ABOVE REFERENCED REPORT OF RECEIPTS AND EXPENDITURES AS REQUIRED BY THE FEDERAL ELECTION CAMPAIGN ACT, AS AMENDED. YOU WERE PREVIOUSLY NOTIFIED OF THE DUE DATE FOR THIS REPORT.

IT IS IMPORTANT THAT YOU FILE THIS REPORT IMMEDIATELY WITH THE FEDERAL ELECTION COMMISSION, 999 E STREET, N.W., WASHINGTON, D.C., 20463. A COPY OF THE REPORT OR RELEVANT PORTIONS SHOULD ALSO BE FILED WITH THE SECRETARY OF STATE OR EQUIVALENT STATE OFFICER, UNLESS THE STATE IS EXEMPT FROM THE FEDERAL REQUIREMENT TO RECEIVE AND HAINTAIN PAPER COPIES.

ALTHOUGH THE COMMISSION MAY INITIATE AN AUDIT OR LEGAL ENFORCEMENT ACTION CONCERNING THIS MATTER, YOUR PROMPT RESPONSE AND A LETTER OF EXPLANATION WILL BE TAKEN INTO CONSIDERATION.

IF YOU HAVE ANY QUESTIONS REGARDING THIS MATTER, PLEASE CONTACT LUCY DENNY ON OUR TOLL FREE NUMBER (800)424-9530. OUR LOCAL NUMBER IS (202)694-1130.

SINCERELY.

JOHN D. GIBSON ASSISTANT STAFF DIRECTOR REPORTS ANALYSIS DIVISIO

TELECON

| ANALYSI: | ł · · · · · · · · · · · · · · · · · · · |
|--------------------|---|
| | Lucy J. Denny |
| COMMITTEE: | |
| | Citizens for the Republic |
| SUBJECT(S): | |
| | Failure to File Report |
| | |
| | |
| DATE: | |
| | June 8, 2000 |
| CONVERSATION WITH: | · |
| | Angela Ruchanan assistant treasurer (message) |

The RAD analyst attempted to contact Carolyn Robertson, treasurer. The analyst found a phone number on an amendment, however, Ms. Roberston is not at that number. The analyst then asked for Angela Buchanan, who was referenced on the amendment. Ms. Buchanan was in a meeting, so the analyst was transferred to her assistant. The analyst left a message with Ms. Buchanan's assistant stating that it appeared the Committee had not filed the 2000 Q1. The assistant said she would pass the message on and have Ms. Buchanan call back.

TELECON

| ANALYST: | | |
|--------------------|---------------------------|----|
| · | Lucy J. Denny | • |
| COMMITTEE: | 1 | |
| | Citizens for the Republic | |
| SUBJECT(S): | 1 | |
| | Failure to File Report | |
| | | |
| | | |
| DATE: | | |
| | June 15, 2000 | |
| CONVERSATION WITH: | · | |
| | Sherry | 95 |

The RAD Analyst received a phone call from Sherry, who was calling for the treasurer of the Committee. The RAD analyst was told the treasurer was out of town and will return on the following Monday (June 19) at which point she will work on the 2000 April Quarterly Report. The analyst told Sherry that if the report was not received soon, the Committee would be referred for legal action.

Attachment # 7
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TELECON

| ANALYST: | · |
|--------------------|--------------------------------|
| | Lucy J. Denny |
| COMMITTEE: | 1 |
| | Citizens for the Republic |
| SUBJECT(S): | |
| | Failure to File Report |
| | , |
| | |
| DATE: , | |
| | June 28, 2000 |
| CONVERSATION WITH: | |
| | Left message with Recentionist |

The RAD Analyst decided to try to call Ms. Angela Buchanan, assistant treasurer, after not hearing from the Committee about the status of the 2000 Q1. Ms. Buchanan was not in the office, so the analyst left a message with the receptionist explaining the Commission still has not received the report and they were going to be referred for legal action. The analyst asked for Ms. Buchanan to call back. Ms. Buchanan was expected back in the office later that day.